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May 5, 2025

By ECF

Hon. Colleen McMahon  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Re: *United States v. Khaim Mavlyanov, 23 Cr. 415 (CM)*

Dear Judge McMahon:

This letter is respectfully submitted to request an adjournment of the next status conference in the above-captioned matter, currently scheduled for May 8, 2025, to June 18, 2025, at 2:00 p.m., which the parties understand is a date and time convenient for the Court.

The parties respectfully request that the time between today and the adjourned status conference be excluded pursuant to the provisions of the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A). We submit that the ends of justice served by the granting of the proposed exclusion outweigh the best interests of the public and the defendant in a speedy trial, as the proposed exclusion will allow the parties to continue discussions regarding the possibility of pretrial resolution of this case.

Respectfully submitted,

/s/ James Kousouros  
James Kousouros, Esq.

c.c. All Counsel of Record (By ECF)

